

AARON D. FORD
Attorney General
DAWN R. JENSEN (Bar No. 10933)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 East Washington Avenue
Suite 3900
Las Vegas, Nevada 89101
(702) 486-3195 (phone)
(702) 486-3773 (fax)
Email: drjensen@ag.nv.gov

*Attorneys for Defendants
Brian Williams and Jay Barth*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD E. MITCHELL, JR.,

Plaintiff,

v.

BRIAN WILLIAMS, SR., *et al.*,

Defendants.

USDC 2:19-cv-01066-APG-DJA
USDC 2:19-cv-01933-JAD-DJA
USDC 2:20-cv-01651-APG-VCF
USDC 2:17-cv-00686-APG-DJA; 9th Cir.
19-17350
USDC 2:17-cv-00986-JAD-BNW; 9th Cir.
20-15912
USDC 2:19-cv-00190-GMN-DJA

**JOINT REQUEST FOR FOURTEEN
ADDITIONAL DAYS TO FILE
STIPULATION AND ORDER FOR
DISMISSAL PURSUANT TO ECF
NO. 20**

Defendants, Eric Gomez, Kelly Quinn, Jay Barth, Brian Williams, Michael Dante, Louis Wallace, Ryan Hesler, Devona Jimenez, Patrick Moreda, Anthony Herrera, Ronald Oliver, John Borrowman, Jennifer Nash, Carrie Alvarado, Timothy Filson, Jerry Howell, Bianca Knight-Groover, Dwight Neven, Perry Russell, and Anthony Warren, all of whom either named in defendants in one or more of the above named cases, by and through counsel, Aaron D. Ford, Nevada Attorney General, D. Randall Gilmer, Chief Deputy Attorney General, Alexander J. Smith and Dawn R. Jensen, Deputy Attorney Generals, of the State of Nevada, Office of the Attorney General, and Plaintiff Donald Mitchell by and through counsel Diana Ebron, Esq., who was specifically appointed to represent Mitchell

under the United States District Court for the District of Nevada's Pro Bono Program in Case No. 2:17-cv-00686-APG-DJA, as well as for purposes of the Global Settlement Conference, hereby jointly request an extension of fourteen (14) days to file the Stipulation and Order for Dismissal.

A global settlement conference was held on January 27, 2022 regarding Case Nos. 2:19-cv-01066-APG-DJA, 2:19-cv-01933-JAD-DJA, 2:19-cv-01651-APG-VCF, 2:17-cv-00686-APG-DJA, 9th Cir. 19-17350, 2:17-cv-00986-JAD-BNW, 9th Cir. 20-15912, 2:19-cv-00190-GMN-DJA. A settlement was reached. It was ordered that the Stipulation and Order for Dismissal be filed no later than February 28, 2022. ECF No. 20¹.

The parties are engaged in ongoing efforts to finalize this settlement. The documents have been prepared and provided to Plaintiff's counsel. Plaintiff's counsel secured an in person visit with Plaintiff to review the documents and obtain signatures. However, upon arrival at the institution, Plaintiff's counsel was unable to meet with Plaintiff due to a positive COVID-19 test. The Office of the Attorney General is currently assisting with alternative arrangements. However additional time is needed to file the Stipulation and Order for Dismissal.

Therefore, the parties jointly request an extension of fourteen (14) days, or until Monday, March 14, 2022, to file the Stipulation and Order for Dismissal.

DATED this 28th day of February, 2022.

AARON D. FORD
Attorney General

By: /s/ Dawn R. Jensen
DAWN R. JENSEN (Bar No. 10933)
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED.

Dated: March 1, 2022


UNITED STATES MAGISTRATE JUDGE

¹ Case No 2:20-cv-01651-APG-VCF

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on the February 28, 2022, I electronically filed the foregoing **JOINT REQUEST FOR FOURTEEN ADDITIONAL DAYS TO FILE STIPULATION AND ORDER FOR DISMISSAL PURSUANT TO ECF NO. 20** via this Court's electronic filing system.

Donald Mitchell, #94796
High Desert State Prison
P.O. Box 650
Indian Springs, Nevada 89070
Email: HDSP_LawLibrary@doc.nv.gov
Plaintiff, Pro Se

/s/ Cathy L. Mackerl
CATHY L. MACKERL, an employee of the
Office of the Nevada Attorney General